

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)
) Chapter 11
)
) Case No. 23-11071 (PB)
)
560 SEVENTH AVENUE OWNER SECONDARY LLC,)
)
)
)
)
)
Debtor.)

NOTICE OF MOTION FOR RELIEF FROM STAY AND HEARING THEREON

PLEASE TAKE NOTICE that **AREPIII MVTS, LLC** and **CREP TIMES SQUARE HOTEL LLC** will together move the Court (the “Motion”), before the Honorable Philip Bentley, United States Bankruptcy Judge for the Southern District of New York, at the Courthouse thereof located at the Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408, in Courtroom 601 on **August 3, 2023 at 11:00 am Eastern Daylight Time (New York)**, or as soon thereafter as counsel can be heard, for an order, pursuant to §362(d) of the Bankruptcy Code, granting relief from the stay provided by §362(a) of the Bankruptcy Code and granting such other and further relief as may to the Court appear appropriate.

PLEASE TAKE FURTHER NOTICE that the hearing on the Motion will be conducted using Zoom for Government and any party wishing to appear at such hearing, whether making a live or listen only appearance before the Court, needs to make an eCourtAppearance through the Court’s Website: <http://www.nysb.uscourts.gov/ecourt-appearances>.

PLEASE TAKE FURTHER NOTICE that the deadline to sign up for the hearing on the Motion is 4:00 pm on August 2, 2023 (i.e. the business day before the day the hearing on the Motion is scheduled).

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Bankruptcy Rule 9006-1(b), any answering papers must be served so as to ensure actual receipt not later than July 27, 2023 (i.e. seven (7) days before the return date of the Motion).

PLEASE TAKE FURTHER NOTICE that, if no objections to the relief sought by the Motion are timely filed and served, the Court may enter an order, substantially in the same form as the proposed order annexed to the Motion, which the Court may enter without any notice or opportunity to be heard.

Dated: New York, New York
July 12, 2023

PAUL HASTINGS LLP

By: /s/ Harvey A. Strickon
Harvey A. Strickon

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